

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

SAMUEL NEGRON AGOSTO

(DEBTORS)

CASE NO. 10-031127 SEK

CHAPTER 13

**INFORMATIVE MOTION
(AMENDED PLAN DATED 05/17/2011)**

TO THE HONORABLE COURT:

Comes now Debtor (s), represented by the undersigned attorney, and represents as follows:

1. Debtor (s) informs the filing of Pre-Confirmation Amended Plan dated 05/17/2011:

a. To provide for partial post petition arrears payment to DORAL BANK (the other partial payment to be made directly).

b. To provide the Internal Revenue Service with direct payments on its secured portion of its claim, outside of the plan, for the amount of \$200.00 per month upon confirmation of the plan, for the duration of the same; the balance outstanding to be paid after completion of the plan as agreement to be stipulated.

WHEREFORE, Debtor (s) prays from this Honorable Court to take notice and allow filing of the amended plan.

RESPECTFULLY SUBMITTED.

NOTICE: Within twenty eight (28) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this

paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all CM/ECF participants in this case, including: U.S. Trustee, and to the Assistant U.S. Trustee. Furthermore, I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the attached master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, May 19, 2011.

s/JOSE L. JIMENEZ QUINONES

José L. Jiménez Quiñones, Esq.

USDCPR 203808

268 AVE. PONCE DE LEON

Suite 1118

San Juan, P.R. 00918-2007

TEL: 787-282-9009

FAX: 787-282-9009

jimenezlawoffice@gmail.com

NEGRON AGOSTO SAMUEL
PO BOX 1666
FAJARDO PR 00738

GOBIERNO MUNICIPAL DE FAJARDO
PO BOX 865
FAJARDO PR 00738

JIMENEZ - QUINONES LAW OFFICES
268 PONCE DE LEON STE 1118
SAN JUAN PR 00918-2007

INTERNAL REVENUE SERVICES
PO BOX 16236
PHILADELPHIA PA 19114-0236

ADMINISTRACION COND VILLA MARINA
BOX ADMINISTRACION
FAJARDO PR 00738

IVELISSE SANTIAGO SANCHEZ
BO NARANJO 117
FAJARDO PR 00738

ASUME - FAJARDO
DIV DE QUIEBRAS
PO BOX 952
FAJARDO PR 00738

KIOMARYS TORRES CRUZ ESQ
PO BOX 1003
FAJARDO PR 00738

CRIM
PO BOX 195387
SAN JUAN PR 00918-5387

LIBERTY CABLEVISION
PO BOX 179
LUQUILLO PR 00773

CRIM
PO BOX 195387
SAN JUAN PR 00918-5387

LIBERTY FINANCE (SIMED)
PO BOX 71493
SAN JUAN PR 00936-8593

DEPTO DE HACIENDA
PO BOX 9024140
SAN JUAN PR 00902-2020

MARIELA MORALES CAMPS ESQ
PO BOX 195389
SAN JUAN PR 00919-5389

DORAL BANK
1451 FD ROOSEVELT AVE
SAN JUAN PR 00920-2717

MERCEDES HERNANDEZ
CALLE MAYAGUEZ BDA OBRERA 169
FAJARDO PR 00738

EUROBANK
SECCION DE COBROS
PO BOX 191009
SAN JUAN PR 00919-1009

PUERTO RICO OFFICE SUPPLY
BMS 266 PO BOX 607061
BAYAMON PR 00960-7405

EUROBANK
PO BOX 191009
SAN JUAN PR 00919-1009

TREASURY SECRETARY
DEPARTAMENTO DE HACIENDA
PO BOX 9024140
SAN JUAN PR 00902-4140

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **10-03127-13**

NEGRON AGOSTO, SAMUEL

Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☒ AMENDED PLAN DATED: **5/17/2011**

☐ PRE ☐ POST-CONFIRMATION

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ **250.00** x **6** = \$ **1,500.00**
\$ **500.00** x **6** = \$ **3,000.00**
\$ **1,500.00** x **48** = \$ **72,000.00**
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ **76,500.00**

Additional Payments:

\$ **24,000.00** to be paid as a LUMP SUM
within **60 months** with proceeds to come from:

☐ Sale of Property identified as follows:

☒ Other:

**FROM MOONLIGHTING SHIFTS AT
EMERGENCY UNITS IN THE FAJARDO AREA
HOSPITALS.**

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ **100,500.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ **1,824.00**

Signed: **/s/ SAMUEL NEGRON AGOSTO**
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. **DORAL BANK** Cr. **DORAL BANK** Cr. _____
0383 # **POST PET ARREAR** # _____
\$ **11,790.52** \$ **1,948.56** \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. **CRIM** Cr. _____ Cr. _____
9205 # _____ # _____
\$ **2,494.91** \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

INTERNAL REVENUE DORAL BANK

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2).

D. UNSECURED CLAIMS: Plan ☒ Classifies ☐ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. **EUROBANK** Cr. _____ Cr. _____
PRE & POST ARREA # _____ # _____
\$ **9,179.82** \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

**1. SECURED PORTIONS OF PUERTO RICO TREASURY, POC #7 AND IRS, POC #2
WILL BE PAID OUTSIDE OF THE PLAN, BEGINNING AFTER ITS COMPLETION.
PRIORITY PORTIONS WILL BE PAID BY THE TRUSTEE.**

**2. REGULAR POST-PETITION LEASE PAYMENTS WILL BE MAINTAINED
DIRECTLY BY DEBTOR TO EUROBANK.**

**3. REGULAR DIRECT MONTHLY PAYMENTS IN THE AMOUNT OF \$200.00 WILL
BE MADE TO IRS's SECURED PORTION OF THE CLAIM, STARTING JUNE 2011.**

Attorney for Debtor **JIMENEZ - QUINONES LAW OFFICES**

Phone: **(787) 282-9009**

AMENDED CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 1 of 1

	Cr	#	\$
Executory Contracts - Assumed:	EUROBANK		